



January 23, 2004

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EX PARTE – VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: CC Docket No. 96-45; WC Docket No. 03-133; WC Docket No. 02-361
Notice of Oral Ex Parte Presentation

Dear Ms. Dortch:

On January 21, 2004, Ron Duncan, President of GCI, and I met with Commissioner Copps and Jessica Rosenworcel of his staff. In the meeting, GCI reiterated the need for implementing competitively-neutral universal service policies and deploying competition to discipline demands on the universal service fund. Consistent with its prior filings in CC Docket No. 96-45, GCI advocated capping per line support in a study area with competitive ETCs and making support truly portable. In addition, the definition of supported services could be revisited to ensure that only those services intended for support receive support. GCI also provided a copy of the David Sappington paper, "Harnessing Competitive Forces to Foster Economical Universal Service," filed in CC Docket No. 96-45 on December 19, 2003.

GCI also urged the Commission to deny the pending AT&T Petition for Declaratory Ruling on Enhanced Prepaid Calling Card Services. By mischaracterizing its intrastate traffic that originates and terminates in Alaska as interstate, AT&T has unfairly shifted a greater proportion of the intrastate common line pool onto GCI by reporting fewer AT&T Alascom intrastate minutes. Moreover, the Regulatory Commission of Alaska has already ruled against this practice of mischaracterizing intrastate minutes. GCI also recommended that the Commission deny AT&T's pending petition for declaratory ruling seeking to exempt it from access charges for certain phone-to-phone calls utilizing an IP transmission technology. The Commission should holistically consider the appropriate regulatory framework for various VoIP applications and the interrelationship with intercarrier compensation and universal service.

In accordance with the Commission's rules, a copy of this letter is being filed in the above-captioned proceedings.

Sincerely,
/s/
Tina M. Pidgeon
Vice President, Federal Regulatory Affairs